REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

I. STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 1, 2, 4, 6-8, 13-14, 23, 25-27, and 30 are currently pending. Claims 15-22 have been cancelled and claims 3, 5, 9-12, 24, and 28-29 are withdrawn from consideration. It is submitted that the withdrawn claims should be reconsidered and reintroduced into the application when the independent claims from which they depend are found allowable.

Claims 1, 2, 4, 6, 7, 23, 25 and 26 have been amended in this response. Support for this amendment can be found throughout the application as originally filed. No new matter has been introduced by this amendment.

II. RECORDATION OF PHONE INTERVIEW

Initially, the Examiner is thanked for granting Applicants' attorneys a telephone interview on April 11, 2007. The claim amendments as outlined above and the following remarks are believed to address the issues discussed during the telephone interview.

III. REJECTIONS UNDER 35 U.S.C. §§ 101 & 112 HAVE BEEN OVERCOME

Claims 1, 2, 4, 6, 7, 23, 25 and 26 have been amended to improve the clarity of the claimed subject matter, overcoming the §§101 and 112 rejections.

IV. REJECTIONS UNDER 35 U.S.C. §102(b) HAVE BEEN OVERCOME

Claims 1, 2, 4, 6-8, 13, 23 and 25-27 were rejected under 35 U.S.C. § 102(b) as allegedly anticipated by U.S. Patent No. 5,498,468 to Blaney.

Amended claim 1 recites, *inter alia*:

"A hydroentangling support fabric ... **said support fabric comprising flat filaments**." (emphasis added)

As understood by the Applicants, Blaney relates to a flexible fabric composed of a fibrous matrix of ribbon-like, conjugate, spun filaments, and a method of making thereof, which includes the steps of providing a fibrous matrix composed of individual, spun filaments bonded at spaced-apart bond locations and applying a flattening force to the fibrous matrix to durably distort the core of individual filaments into a **ribbon-like configuration** having a width greater than its height. The flattening force therein is applied by using pressure and temperature, such as a calender roll arrangement. *Blaney*, col. 5, lines 10-19, Figs. 3-10.

As it can be clearly seen from Fig. 6 in Blaney, the flattened filaments of Blaney are oval in shape, at the best, and not "flat" as recited in the instant claims. The flat monofilaments of the instant invention promote greater reflective water flow, and therefore greater reflective entanglement energy. By promoting greater reflective entanglement energy, the fabric promotes greater entanglement of the fibers making up the nonwoven, and thereby provides for a stronger finished nonwoven. That is, when water is directed at the fabric in a direction perpendicular, or substantially perpendicular to the plane in which the flattened yarns lie, some water will reflect off and further entangle the fibers. *Instant Application*, paragraph 31.

Applicants respectfully submit that Blaney does not teach or suggest the above identified feature of claim 1. Specifically, Blaney does not teach or disclose the use of flat filaments, as recited in instant claim 1.

Therefore, Applicants respectfully submit that independent claim 1 is patentable over Blaney. Since claim 23 is similar in scope, independent claim 23 is also patentable.

Dependent claims 2, 4, 6-8, 13-14, 25-27, and 30 depend from either claim 1 or claim 23 discussed above, and are therefore patentable over Blaney.

V. REJECTIONS UNDER 35 U.S.C. §103(a) HAVE BEEN OVERCOME

Claims 1-2, 4, 6, 23, and 25-27 were rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over U.S. Patent No. 3,110,905 to Rhodes, in view of, U.S. Patent No. 6,060,145 to Smith.

Rhodes relates to a soft floor covering such as a tufted pile fabric produced on a tufting machine. Smith relates to a method of manufacturing a carpet. Specifically, a secondary backing fabric for use in a carpet, comprising a secondary backing scrim fabric and a fiber batt integrated with the secondary backing fabric.

The relied upon portions of Smith merely disclose that the mechanical bonding of the nonwoven web 21 onto the woven secondary backing fabric 15 can be done by needlepunching, hydroentangling or stitchbonding. Smith further discloses that hydroentangling utilizes high speed water jets to accomplish the bonding of this fiber web. *Smith*, col. 9, lines 26-47. There is no teaching or suggestion in Smith for the use of a support fabric comprising flat yarns in a hydroentangling device. Furthermore, the instant invention is not directed to a tufted fabric or a

secondary backing material for use in a carpet, but a support fabric comprising flat yarns for use in a hydroentangling device.

Therefore, Applicants respectfully submit that there is no teaching or suggestion in either Rhode or Smith for the use of a support fabric comprising flat yarns in a hydroentangling device, as recited in independent claim 1.

Therefore, Applicants submit that independent claim 1 is patentable over the combination of Rhodes and Smith and respectfully request the withdrawal of the rejection. Since claim 23 is similar in scope, independent claim 23 is also patentable over this combination.

Dependent claims 2, 4, 6-8, 13-14, 25-27, and 30 depend from either claim 1 or claim 23 discussed above, and are therefore patentable over the combination of Rhodes and Smith.

Claims 1, 6, 13-14, 23, 25-27 and 30 were rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over U.S. Patent No. 5,142,752 to Greenway, in view of U.S. Patent No. 4,345,730 to Leuvelink. These rejections are traversed at least for the following reasons.

Greenway, clearly, discloses: "FIG. 1 shows a fabric process line 10 in accordance with the invention for production of nonwoven fabrics including, a series of conventional carding apparatus C1-C6, a random web former 12, conveyor belts 40, 42 and 44, and pre-wet wire station 14 which feeds a randomized web 16 to hydroentangling modules 18, 20. At the output end of the entangling module 20, the line includes a vacuum slot extractor station 22, a conventional padder 24, and dry cans 26 which provide a finished nonwoven fabric 16 for stock rolling on a winder 30. An antistatic roll 32 and weight determination gauge 34 are also employed on the line." *Greenway*, col. 4, lines 33-46.

In paragraph 11 of the Office Action, the Examiner combines the teachings of Greenway with Luvelink to derive the instant invention. However, Applicants would like to point out that Greenway does not use conveyor belts for the hydroentangling process (See col. 4, lines 33-46 above and Fig. 1), but pre-wet wires, which feeds a randomized web to hydroentangling modules 18, 20. Therefore, the combination of the relied upon portions of Greenway and Luvelink clearly no do not teach or suggest a support fabric comprising flat filaments for use in hydroentangling process, as recited in the instant claims.

Moreover, Luvelink relates to a dimensionally stable link-belt comprising a multiplicity of helical coils arranged in interdigitated side-by-side disposition and connected together by respective hinge wires threaded therethrough. There is no teaching or suggestion in Luvelink for the use of its fabric in hydroentangling process. Therefore, there is no motivation for one skilled in the art to combine the teachings of Greenway and Luvelink, especially to produce a support fabric with flat filaments for use in a hydroentanglement device.

Therefore, Applicants respectfully submit that claim 1 patentably distinguishes over the combination of Greenway and Luvelink, and therefore should be allowed. For similar reasons independent claim 23 is also allowable.

Dependent claims 2, 4, 6-8, 13-14, 25-27, and 30 depend from either claim 1 or claim 23, as discussed above, and are similarly patentable over the combination of Greenway and Leuvelink.

In the event that the Examiner disagrees with any of the foregoing comments concerning the disclosures in the cited prior art, it is requested that the Examiner indicate where in the reference, there is the basis for a contrary view.

The Examiner has apparently made of record, but not applied, several documents. The Applicants appreciate the Examiner's implicit finding that these documents, whether considered alone or in combination with others, do not render the claims of the present application unpatentable.

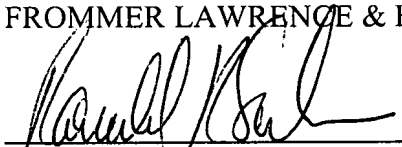
CONCLUSION

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable over the prior art, and early and favorable consideration thereof is solicited.

Please charge any fees incurred by reason of this response and not paid herewith to Deposit Account No. 50-0320.

If any issues remain, or if the Examiner has any further suggestions, the Examiner is invited to call the undersigned at the telephone number provided below. The Examiner's consideration of this matter is gratefully acknowledged.

Respectfully submitted,
FROMMER LAWRENCE & HAUG LLP

By: 

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